

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: : Chapter 11
:
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
-----X

**CLAIMS LITIGATION SCHEDULE FOR THE
OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION
TO CLAIMS OF NOMURA GLOBAL FINANCIAL PRODUCTS, INC.**

This Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of Nomura Global Financial Products, Inc. [Docket No. 8612] (the “Nomura GFP Claim Objection”), submitted in accordance with the Order Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors, entered April 19, 2010 [Docket No. 8474] (the “Claims Procedures Order”), is adopted by this Court as the Claims Litigation Schedule for the Nomura GFP Claim Objection.

1. Amended pleadings may not be filed except with leave of the Court. Any motion to amend shall be filed within 30 days after entry of this order.
2. All fact discovery shall be completed by January 28, 2011.
3. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026, Federal Rules of Civil Procedure 26(a)(2) and 26(a)(3) shall apply to this contested matter. The following interim deadlines may be extended by the written consent of the parties without

application to the Court, provided all fact discovery is completed by the date set forth in paragraph 2 above:

- A. Requests for production of documents may be served no later than September 27, 2010.
- B. Objections to requests for the production of documents to be filed within 20 days of the service of each request or set of requests for the production of documents.
- C. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(a) and 7033-1(b) may be served no later than September 27, 2010.
- D. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) may be served no earlier than December 1, 2010 and no later than January 28, 2011.
- E. Requests for admissions may be served no earlier than December 1, 2010 and no later than January 28, 2011.
- F. Document production to be substantially completed by October 29, 2010.
- G. Depositions of fact witnesses to be completed by January 28, 2011.

4. Expert reports will be exchanged on February 28, 2011. The parties will exchange any rebuttal expert reports on March 29, 2011. Expert discovery to be completed 21 days after the receipt of the last expert report.
5. Dispositive motions to be filed no later than April 29, 2011.
6. A pre-merits hearing conference shall be held at a date to be determined.
7. The merits hearing shall be held at a date to be determined in accordance with the Claims Procedures Order.

Dated: July 7, 2010
New York, New York

/s/ Aviva Warter Sisitsky

Corinne Ball
Jayant W. Tambe
Aviva Warter Sisitsky
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

*Attorneys for the Debtors and
Debtors in Possession*

Dated: July 7, 2010
New York, New York

/s/ Brian H. Polovoy

Douglas P. Bartner
Henry Weisburg
Brian H. Polovoy
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (212) 848-7179

*Attorneys for Nomura Global
Financial Products, Inc.*

SO ORDERED:

Dated: New York, New York
July 19, 2010

s/ James M. Peck
Honorable James M. Peck
United States Bankruptcy Judge